

Appln No. 09/688,452

Amdt date April 12, 2004

Reply to Office action of December 12, 2003

REMARKS/ARGUMENTS

Applicants thank the Examiner for his attention to this application.

Claims 1-68 are pending. By this paper, Applicants have amended independent claims 1, 30 and 57.

Applicant is filing a Request for Continued Examination concurrently with this response. Applicant respectfully requests that the Examiner contact Applicant's undersigned counsel to conduct an interview with respect to the claimed subject matter and the cited art, as there appears to be a potential misunderstanding regarding the claimed invention.

In particular, in the December 12, 2003 Office Action, the Examiner appears to have considered the original claims filed in the subject application, as opposed to the claims as amended in Applicant's September 19, 2003 Amendment and response to the first Office Action dated March 19, 2003. By way of example, regarding claim 1, paragraph 3 of the December 12, 2003 Office Action appears identical to paragraph 8 of the March 19, 2003 Office Action even though Applicant amended claim 1 in response to the first Office Action. The Examiner's "Response to Arguments" set forth in Paragraph 33 of the December 12, 2003 Office Action does not appear to address all of the amendments and arguments Applicant made in support of patentability as set forth in the September 19, 2003 response, such as the amendment made to the independent claims directed to a cryptographic device capable of performing value management functions for one or more users. As such, reexamination and reconsideration of the claims as amended is respectfully requested. Applicant is

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hopeful that the interview it is requesting may help to focus attention on the distinctions between the claimed invention and the cited art.

The Examiner has continued his rejection of claims 1-68 under 35 U.S.C. §103(b) as being unpatentable over Whitehouse, U.S. Patent 6,005,945 ("Whitehouse") in view of Leon, U.S. Patent 6,424,954 ("Leon"). Applicant respectfully requests that the rejection be withdrawn.

Independent claim 1 includes, among other limitations, "a cryptographic device remote from the plurality of user terminals and coupled to the computer network, wherein the cryptographic device includes a computer executable code for authenticating one or more users and verifying that the authenticated user is authorized to assume a role." Applicant has further amended the claim to recite that "the cryptographic device is not dedicated to specific user terminals." Claims 30 and 57 also contain the limitations set forth in those claims. Neither reference relied upon by the Examiner, alone or in combination, discloses or suggests such a nondedicated system.

In marked contrast to the claimed invention, Whitehouse specifically teaches away from a distributed, nondedicated system including a plurality of cryptographic devices, in which any one or more of a plurality of cryptographic devices may service the needs of any of more of a plurality of user terminals. According to Whitehouse, "[a] key aspect of the system is that all secure processing required for generating postal indicia is performed at secure central computers." As clearly stated by Whitehouse, each secure central computer has

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its own local memory with its own customer information. As stated by Whitehouse: "The secure central computer 102 at a central site contains all of the customer account information, current balances, a transaction log for each customer, details on each mail piece indicia dispensed, and encryption software and keys." See Whitehouse, Abstract; col. 6, lines 21-30; col. 9, lines 12-20, and FIG 4. Whitehouse, therefore, discloses a system including central computers, in which each central computer is dedicated to particular users based upon whether the central computer holds the information pertaining to that customer's account. It does not disclose a nondedicated system including cryptodevices, any of which may be used to provide role assignments to a user, as set forth in the claims of the present invention.

The nondedicated nature of the cryptographic devices provides a number of advantages over the system disclosed in Whitehouse. By way of example, in Applicant's system, an available cryptomodule may be used to service customers in a flexible and dynamic manner. Where needed, in Applicant's system additional cryptomodules may be added instead of dedicating an entirely new central computer and local memory to each set of users. Accordingly, Applicant's system provides a degree of efficiency and flexibility not realized or contemplated by Whitehouse. Therefore, Applicant respectfully requests that claims 1 and 29 be allowed.

Leon, the secondary reference cited by the Examiner in support of the Section 103(a) rejection, is of the category of specialized hardware-based systems located at the user's site

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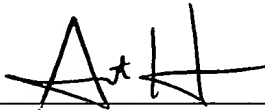
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that are specifically distinguished in the Background section of the present application. Leon's system teaches a dedicated postage metering system (SMD) connected to the user's computer as an external hardware device or circuit card that is portable. The SMD couples to the personal computer via a communications link 122 that can be a serial link such as an RS-232 interface. By carefully partitioning the various features of the metering system, Leon teaches that the SMD can be manufactured in a relatively small size and low cost unit. See Leon, col. 2, lines 29-40, col. 3, line 61- col. 4, line 20, FIGs. 1A and IB. In Leon's system, each SMD performs state functions. See Leon, cols. 9, 10. Accordingly, in Leon's system, depending on the number of users, there may be thousands of individual localized SMDs attached to each user's PC, each one dedicated to a specific user or user terminal.

In view of the foregoing amendments and remarks, Applicants respectfully submit that this application is now in condition for allowance, and accordingly request early issuance of a Notice of Allowance.

Respectfully submitted,
CHRISTIE, PARKER & HALE, LLP

By 
Art Hasan
Reg. No. 41,057
626/795-9900

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